



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

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COMMISSIONER

August 6, 2002

David S. Rosenzweig  
Keegan, Werlin and Pabian, LLP  
21 Custom House Street  
Boston, MA 02110

Re: KeySpan Energy Delivery D.T.E. 02-32

Dear Mr. Rosenzweig:

Enclosed please find the Department of Telecommunications and Energy's First Set of Information Requests to KeySpan Energy Delivery New England and NSTAR ("the Companies") issued in the above-captioned matter. Please submit the Company's responses before, 10 a.m., Thursday, August 8, 2002.

Thank you for your attention in this matter.

Sincerely,

Elizabeth A. Cellucci  
Hearing Officer

Enc.

cc: Mary Cottrell, Secretary  
Joseph Rogers, Office of the Attorney General

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

FIRST SET OF INFORMATION REQUESTS OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY  
TO KEYSpan ENERGY DELIVERY NEW ENGLAND AND NSTAR GAS COMPANY  
D.T.E. 02-44

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Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to KeySpan Energy Delivery New England ("KeySpan") and NSTAR Gas Company ("NSTAR"), or collectively "the Companies", the following Information Requests:

**INSTRUCTIONS**

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:  
  
Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn, and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If the Company finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit one (1) copy of the response to: (1) Elizabeth Cellucci, Hearing Officer; (2) Kevin Brannelly, Rates and Revenues Division; (2) Paul Osborne, Rates and Revenues Division; (3) George Yiankos, Gas Division; (4) Xuan Yu, Rates and Revenues Division; and (5) Becky Hanson, Legal Division.
8. Responses are due by 10 a.m., Thursday, August 8, 2002.

- DTE 1-1 Please provide a legible map of Plymouth which highlights and distinguishes the sections of Plymouth referred to in this filing, including Buttermilk Bay, the Ponds and Cedarville.
- DTE 1-2 Please provide bill impacts, excluding the gas adjustment factor (GAF), for each affected customer rate class. The analysis should compare the rates of Colonial Gas Company and NSTAR Gas Company, for each rate class, for various levels of usage, and for peak and off-peak seasonal rates. Please include a comparison for zero-use customers. Also indicate the average usage for each rate class.
- DTE-1-3 Please provide bill impacts, including the gas adjustment factor (GAF), for each affected customer rate class. The analysis should compare the rates of Colonial Gas Company and NSTAR Gas Company, for each rate class, for various levels of usage, and for peak and off-peak seasonal rates. Please create a separate category for zero-use customers. Also indicate the average usage for each rate class.
- DTE-1-4 Please refer to page 3 of the filing, which states that the 2002 Agreement will result in lower bills annually for the Rate R-3 Plymouth Customers except for (a) zero-use customers and (b) customers using heat predominantly during off-peak periods. Please further describe these customer groups and provide bill impacts for each group.
- DTE-1-5 Of the customers affected by the proposed transfer, during the last twelve (12) months, how many had zero-usage and for which months?
- DTE-1-6 Of those customer affected by the proposed transfer, are any on Rate R-2? If so, how will R-2 customers be affected by the transfer? Will these customers experience lower bills?
- DTE-1-7 Please refer to the Companies' letter of June 27, which states that in addition to the proposed transfer, KeySpan will temporarily provide tariffed bundled services to NSTAR Gas for sale to approximately 240 customers in the Buttermilk Bay section. Are these 240 customers included in the 1,104 customers, referenced on page 3 of the filing, or are these customers a separate category?

- DTE-1-8 Please refer to page 2 of the 2002 Agreement. Please provide all supporting documentation and accounts to demonstrate how the purchase price, \$ 1,928,738.00, was calculated. As part of this response, provide an account-by-account plant balance associated with the assets to be conveyed to NSTAR Gas.
- DTE-1-9 How and when will the Companies inform customers of the transfer? Please attach any prior written communications with customers regarding the transfer and the most recent draft of any future communication with customers regarding the transfer.
- DTE-1-10 Provide the dollar amount associated with investments in the geographic areas affected by the transfer that were included in the rate base in Colonial Gas Company's last rate case. Please provide supporting documentation.
- DTE-1-11 Please provide all Schedules referred to in Attachments A, B and C of the Joint Petition.